

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SILAS CALHOUN and EMILY CALHOUN,
Individually and as Parents and Next Friends
of ESTELLA CALHOUN,

Plaintiff,

v.

UNITED STATES OF AMERICA

Defendant.

Civil Action No. 04-10480-RGS

**JOINT MOTION FOR ENLARGEMENT OF TIME
TO COMPLETE DISCOVERY**

The parties, by and through their attorneys, hereby move this Court for an enlargement of time to complete discovery. Good cause exists for this motion.

The subject plaintiff and her parents do not reside in the jurisdiction, but in Hawaii due to Silas Calhoun's active duty in the armed forces. Although the parties have completed substantial fact discovery and depositions, the case involves complex medical issues that will require careful evaluation and consideration, including proposed expert testing and evaluation of the subject plaintiff in Hawaii, and the completion of educational needs evaluations. For these reasons the following adjustments to the completion of discovery are proposed.

1. Plaintiffs' expert disclosures by July 31, 2006.
2. Defendants' expert disclosures by September 30, 2006.
3. Expert discovery completed by November 17, 2006.
4. Motions for summary disposition due by December 15, 2006.

This Motion is made in good faith and is not made to delay the action, or for any other improper purpose.

For the Plaintiffs,

Silas and Emily Calhoun,
Estella Calhoun,

For the Defendant,

UNITED STATES OF AMERICA
MICHAEL J. SULLIVAN
United States Attorney

/s/ Michael S. Appel (By: APG) 4/14/2006
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CERTIFICATE OF SERVICE

Suffolk, ss.

Boston, Massachusetts
DATE: 4/14/2006

I, Anton P. Giedt, Assistant U.S. Attorney, do hereby certify that I have this day served a copy of the foregoing upon the Plaintiffs' counsel of record by Electronic Filing.

/s/ Anton P. Giedt
Anton P. Giedt
Assistant U.S. Attorney

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